

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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CLAUDE GALLAND, VIOLAINE GALLAND,
PARISTUDIOS

Plaintiffs,

-against-

**NOTICE OF MOTION FOR
JUDGMENT ON THE PLEADINGS
TO DISMISS THE COMPLAINT
AND IN OPPOSITION TO BOTH
MOTIONS TO AMEND THE
COMPLAINT**

Civil Action No.: 14 CV 4411

JAMES JOHNSTON, JUDITH JOHNSTON,
STEPHEN BOWDEN, TERRI BOWDEN

(Judge Richard J. Sullivan)
(Magistrate Judge Ronald L. Ellis)

Defendants.

-----X

MOTION BY:

HERZFELD & RUBIN, P.C.
Attorneys for Defendants
Stephen Bowden and Terri Bowden
125 Broad Street
New York, New York 10004

DATE, AND PLACE OF HEARING

November 13, 2014, on submission to the Honorable
United States Magistrate Judge Ronald L. Ellis,
United States Courthouse, 500 Pearl Street, New
York, New York 10007-1312

SUPPORTING PAPERS:

Affidavit of Terri Bowden, sworn to on September
25, 2014, and the exhibits annexed thereto,
Affirmation of Joseph E. Donat, dated October 13,
2014, and the exhibits annexed thereto, Local Civil
Rule 56.1(a) Statement, dated October 13, 2014, and
all prior pleadings and proceedings heretofore had
herein.

RELIEF DEMANDED:

For an Order pursuant to Fed. R. Civ. P. 12(c)
granting judgment to defendants Stephen Bowden
and Terri Bowden, on the pleadings, dismissing the
Complaint and denying both of plaintiffs' motions to
amend the Complaint.

Dated: New York, New York
October 13, 2014

Respectfully submitted,



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TO:

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File No.: 14SF0262SDNY
Claim No.: 37-33V0-980